

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**IRON MOUNTAIN INCORPORATED;  
et al.**

**Plaintiffs and,  
Counter-Defendants  
v.**

**THOMAS CARR,**

**Defendant and  
Counter-Plaintiff**

**Civil Action No. 05 10890 RCL**

**LOCAL RULE 16.1(d)(3) CERTIFICATION**

Pursuant to Local Rule 16.1(d)(3), the undersigned party, Defendant and Counter-Plaintiff, Thomas Carr and counsel hereby certify that they have conferred:

- a) with a view to establishing a budget for the costs of conducting the full course – and various alternative courses – of the litigation; and
- b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

Thomas Carr

Thomas Carr

5-22-06

Date

Dated: May 22, 2006

Respectfully submitted,

/s/

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Counterclaim Plaintiff